

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

Weimin Shen,

Plaintiff,

vs.

**Automobile Club of Missouri,
Inc.,**

Defendant.

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: Case No. 4:20-cv-00626
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: Hon. Stephen N. Limbaugh, Jr.
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**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE A
RESPONSE TO DEFENDANT’S MOTION FOR ATTORNEYS’ FEES AND
COSTS**

Plaintiff Weimin Shen (“Plaintiff” or “Ms. Shen”), through her attorney Edward A. Khatskin respectfully requests an extension of time to file a Response to Defendant Automobile Club of Missouri (“ACMO’s”) Motion for Attorneys’ Fees and Costs (Doc. 122), and in support thereof states as follows:

1. On June 12, 2023, the Court entered an Order denying Plaintiff’s Motion for Summary Judgment and granting ACMO’s Motion for Summary Judgment. (Doc. 118).
2. On the same day, the Court entered judgment in favor of ACMO and against Ms. Shen. (Doc. 119).
3. On July 3, 2023, ACMO filed a Motion for Attorneys’ Fees and Costs (“Motion for Fees”) seeking a total \$245,686.82. (Doc. 122).

4. After the motion was filed Ms. Shen started contacting attorneys to represent her in opposing the Motion for Fees. The undersigned counsel was retained on July 7, 2023.

5. On July 11, 2023, Ms. Shen *pro se* filed a motion for extension of time to respond to Defendant's Motion to Seal Records. (Doc. 126). The motion was granted and Ms. Shen was granted an extension up to and including August 11, 2023 to respond. (Doc. 129).

6. On July 11, 2023, the undersigned Plaintiff's counsel entered his appearance in the instant case. (Doc. 127).

7. The pleadings, motions, exhibits and other documentary evidence in this case are voluminous and will require time to fully review. Based on preliminary conversations with Ms. Shen, and a cursory review of the case documents, however, Plaintiff's counsel believes there is a sufficient good faith basis to oppose the Motion for Fees (Doc. 122), and the Motion to Seal Records (Doc. 124).

8. Additionally, Plaintiff's counsel has been in negotiations with defense counsel for a resolution of this matter obviating the need for further motion practice.

9. Accordingly, Ms. Shen respectfully requests an additional thirty days to respond to Defendant's Motion for Fees.

10. The requested extension, if granted, will give counsel for both parties the necessary time to either resolve this case without additional motion practice, or, alternatively, give Plaintiff's counsel an opportunity to review the records in this case and appropriately respond to the Motion for Fees.

11. Plaintiff's counsel discussed the instant motion with defense counsel, and defense counsel does not oppose it.

WHEREFORE, Plaintiff Weimin Shen, respectfully requests the Court grant her a thirty-day extension to August 16, 2023, to file her Response to Defendant's Motion for Attorneys' Fees and Costs, and for any additional relief the Court deems just and proper.

Respectfully submitted,

/s/ Edward Khatskin

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